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6 The Honorable Robert S. Lasnik
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9 UNITED STATES DISTRICT COURT
10 FOR THE WESTERN DISTRICT OF WASHINGTON
11 AT SEATTLE

12 ROBERT WILSON and ERIC McNEAL,
13 individually and on behalf of all similarly
14 situated individuals,

15 Plaintiffs,

16 v.

17 MAXIM HEALTHCARE SERVICES, INC.,
18 a Maryland corporation,

19 Defendant.

No. 2:14-cv-00789-RSL

20 **STIPULATED MOTION FOR
21 DISMISSAL AND ~~PROPOSED~~
22 ORDER**

23 NOTE ON MOTION CALENDAR:
24 July 10, 2017

25 **STIPULATED MOTION FOR DISMISSAL**

26 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) and Local Rule 10(g),
Defendant Maxim Healthcare Services, Inc., together with Plaintiffs Robert Wilson and Eric
McNeal (collectively, the "Parties"), by and through the undersigned counsel, respectfully move
the Court to enter the stipulated Order as set forth below.

27 **STIPULATION**

28 The Parties hereby stipulate to the voluntary dismissal of the action in its entirety, *with*
29 prejudice, as to the following seventy-one (71) Named and Opt-in Plaintiffs:

30 1. Arent, Andrew P

31 STIPULATED MOTION FOR DISMISSAL -- 1

32 MILLER NASH GRAHAM & DUNN PC
33 Pier 70, 2801 Alaskan Way ~ Ste. 300
34 Seattle, Washington 98121-1128
35 (206) 624-8300/Fax: (206) 340-9599

- 1 2. Atobrah, Frederick
- 2 3. Batson, Brant D
- 3 4. Brandon, Kyle M
- 4 5. Brown II, Dennis Y
- 5 6. Brown, Jordan A
- 6 7. Bruce, Rachel M
- 7 8. Burgos, Marichelle G
- 8 9. Busjith, Sabina R
- 9 10. Centurion, Diego
- 10 11. Chambers, Brittney F
- 11 12. Clarke, Emile L
- 12 13. Coreth, Ian R
- 13 14. Drummond, Scott M
- 14 15. Farfan, William J
- 15 16. Flynn, Lesley A
- 16 17. Forgey, Ashley M
- 17 18. Gerencher, Jill E
- 18 19. Gillan, Troy M
- 19 20. Green, Michelle M
- 20 21. Greenslitt, Benjamin W
- 21 22. Hale, Jessica L

STIPULATED MOTION FOR DISMISSAL -- 2

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- 1 23. Hanle, Nathan A
- 2 24. Holcomb, Adam C
- 3 25. Hong, Thomas S
- 4 26. Horner, Monica A
- 5 27. Jackson, Kyle R
- 6 28. Johnson, Brandon L
- 7 29. Joustra, Jeremy E
- 8 30. Kent, Terrell J
- 9 31. Kephart, Tim
- 10 32. Khani, Jasmin L
- 11 33. King, Caitlin A
- 12 34. Klettke, Tara E
- 13 35. Kupiszewski, Stephen
- 14 36. Landry, Daniel P
- 15 37. Lanzone, Christine D
- 16 38. Lichter, Emily J
- 17 39. Ligon, Jeffrey B
- 18 40. Lipositz, Justin T
- 19 41. Mawhirter, David T
- 20 42. Mazzanti, Luke W
- 21 43. McMahon, Kelly E

STIPULATED MOTION FOR DISMISSAL -- 3

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1 44. McNeal, Eric A
2 45. Melton, Sara K
3 46. Moye, Katoya T
4 47. Musha, Erin E
5 48. Nelson, Kahley C
6 49. Neu, David M
7 50. Orlenko, Bryan J
8 51. Peyton, Kevin J
9 52. Phillips, Parker H
10 53. Ramirez, Laura
11 54. Romero, Manuel E
12 55. Rowley, Amara A
13 56. Ruebel, Jenna L
14 57. Ruggeberg, Joshua S
15 58. Salamone, Deborah A
16 59. Simmons, Brendon G
17 60. Simmons, Michelle D
18 61. Soto, Veronica A
19 62. Sparks, Branden M
20 63. Staden, Chantz D
21 64. Urena, Edwin S

STIPULATED MOTION FOR DISMISSAL -- 4

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(206) 624-8300/Fax: (206) 340-9599

1 65. Vaughn, Colby A

2 66. Weigand, Robert J

3 67. Wilen, Steven M

4 68. Wilson, Emily B

5 69. Wilson, Robert J

6 70. Wolfe, Steven S

7 71. Woods, Kevin P

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10 These dismissals are warranted because the Named-Plaintiffs and Opt-In Plaintiff s
11 identified above have resolved their claims through individual settlement agreements with
12 Defendant.¹

13
14 **SO STIPULATED:**

15 By: /s/ Jesse L. Young

16 Jason J. Thompson
17 Jesse L. Young
18 SOMMERS SCHWARTZ PC
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20 Southfield, MI 48076
21 Tel: (248) 355-0300
22 Email: jthompson@sommerspc.com
23 Email: jyoung@sommerspc.com

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25 Jacob R. Rusch
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Minneapolis, MN 55413
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27 By: /s/ Thomas F. Hurka

28 Thomas F. Hurka, Pro Hac Vice
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31 Chicago, IL 60601
32 Tel: (312) 324-1000
33 Email: thomas.hurka@morganlewis.com

34 By: /s/ Kaiser H. Chowdhry

35 Lincoln O. Bisbee, Pro Hac Vice
36 Kaiser H. Chowdhry, Pro Hac Vice
37 Amanda C. Dupree, Pro Hac Vice
38 MORGAN, LEWIS & BOCKIUS LLP
39 1111 Pennsylvania Ave., NW
40 Washington, DC 20004

1 Excluded from the instant motion are three remaining Opt-In Plaintiffs— Michael Crother, Taysir Yamin, and
2 Paulette Jackson. The parties expect that their claims, too, will be resolved in the near future. The parties will update
3 the Court accordingly.

1 Email: jrusch@johnsonbecker.com

2 By: /s/ Rebecca J. Roe

3 Rebecca J. Roe

4 Adam J. Berger

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11 *Attorneys for Plaintiffs*

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13 Email: lincoln.bisbee@morganlewis.com

14 Email: kaiser.chowdhry@morganlewis.com

15 Email: amanda.dupree@morganlewis.com

16 By: /s/ Clemens H. Barnes

17 Clemens H Barnes

18 Daniel J. Oates

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25 (206) 777-7537

26 Email: clem.barnes@millernash.com

27 Email: dan.oates@millernash.com

28 *Attorneys for Defendant Maxim Healthcare
29 Services, Inc.*

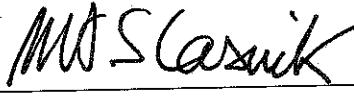
30 STIPULATED MOTION FOR DISMISSAL -- 6

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32 Pier 70, 2801 Alaskan Way ~ Ste. 300

33 Seattle, Washington 98121-1128

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1 ORDER
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3 IT IS SO ORDERED.
4 Dated this 11th day of July, 2017.
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6 
7 The Honorable Robert S. Lasnik
8 United States District Judge
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STIPULATED MOTION FOR DISMISSAL -- 9

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